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August 12, 2021

VIA ECF:

Hon. Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMORANDUM **ENDORSEMENT**

RE: Sanchez, et al. v. KTG Multiservices, Inc., et al.
1:21-cv-00751 (AJN) (GWG)

SECOND LETTER MOTION TO EXTEND TIME TO COMPLETE DISCOVERY

To Your Honor:

This office represents Defendants in the above-captioned action. We write, jointly with Plaintiffs, to request an extension of the time to complete depositions (currently due August 13, 2021) and discovery (currently due August 27, 2021).

This is the Parties' second request for such an extension. The first was filed on July 12, 2021 (Dkt. No. 29) and granted by the Court on July 13, 2021 (Dkt. No. 30). As the Court is aware, it was necessary for the Court to settle certain discovery disputes, and Plaintiffs requested a Local Civil Rule 37.2 Conference. At that time, the previously scheduled depositions did not go forward, in order to wait on the resolution of the discovery requests.

In accordance with the Court's order on August 2, 2021 (Dkt. No. 37), Defendants submitted a compliant affidavit, which was reviewed by Plaintiffs' counsel and Defendants can now confirm that they have produced all responsive documents in their possession, custody, and control. At this juncture, the Parties agree that the affidavit confirms with the Court's order and would like to proceed with the depositions, the remaining discovery left to complete.

The Parties propose the following amended discovery schedule.

1. The Parties have agreed to the following deposition schedule:
 - a. Monday, August 30, 2021: Plaintiffs Posada & Sanchez
 - b. Tuesday, August 31, 2021: Defendants Catalina Gonzalez/KTG
 - c. Wednesday, September 1, 2021: Defendants
 - d. Thursday, September 2, 2021: Defendants Alveiro Echeverri & Rosa Martinez



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2. Depositions to be completed by September 10, 2021.
3. End of discovery to be completed by September 24, 2021.

The Parties also request to adjourn the conference set for September 3, 2021, to a date convenient for the Court after the proposed close of discovery or whatever date the Court may designate for the close of discovery.

The Parties thank the Court for its time and attention to this matter.

Best regards,

Kevin S. Johnson

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The fact discovery deadline is extended to September 24, 2021. The conference before Judge Nathan is adjourned to October 8, 2021 at 3:00 p.m.

SO ORDERED.
Dated: August 13, 2021

Gabriel W. Corenstein
GABRIEL W. CORENSTEIN
United States Magistrate Judge